

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

CASE NO.: 1:20-cr-00114-WMR-CCB

BLESSING OLUWATIMILEHIN)

OJO,)

Defendant.)

DEFENDANT’S SENTENCING MEMORANDUM

COMES NOW, Defendant **BLESSING OLUWATIMILEHIN OJO**, by and through his undersigned counsel, and respectfully asks this Court to consider the information contained in this Memorandum when determining Defendant’s sentence. Defendant submits that upon a review of the sentencing factors contained in 18 U.S.C. § 3553(a), this Court should sentence Defendant to a sentence of 34 months. In support of this sentence, Defendant shows as follows:

A Thirty-Four Month Sentence is Reasonable Under U.S.C. § 3553(a)

Mr. Ojo is thirty-six years old with no prior criminal history. He is the father of one child who lives in Atlanta, Georgia. While awaiting extradition to the United States for this case, Mr. Ojo was housed during the peak of the COVID outbreak at the Mapleshurst Correctional Complex (MCC) in Ontario, Canada for twelve months. During this time, the MCC was overcrowded and understaffed. Inmates were subjected to frequent lockdowns

and were not given routine access to showers or hygiene materials. *See* attached articles related to the MCC and other similar facilities. The conditions at this facility were far worse than those at the Robert A. Deyton Detention Facility and USP Atlanta. As such, Mr. Ojo's pretrial incarceration was not like that of his co-defendants. Therefore, Mr. Ojo respectfully requests a 12-month downward variance from his sentencing guidelines to, in effect, give him two-for-one credit for the time he served awaiting extradition in these horrible conditions.

WHEREFORE, for the foregoing reasons, as well as additional arguments that Mr. Ojo will make at his sentencing hearing, Mr. Ojo respectfully requests a 34-month sentence in his case.

This, the 24th day of October, 2022.

Respectfully submitted,

s/ Benjamin Black Alper

BENJAMIN BLACK ALPER

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CERTIFICATE OF COMPLIANCE

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

This, the 24th day of October, 2022.

Respectfully submitted,

s/ Benjamin Black Alper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the above date, I electronically filed this document using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted,

s/ Benjamin Black Alper

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